

rosnyder@onmediaadsales.com

Office: 770 434-7083

Cell: 770 265-5002

Fax: 770 435-1878

From: Tim Kay [mailto:Tim.Kay@nccmedia.com] Sent: Thursday, February 06, 2014 2:50 PM

To: national national; Michael Manross

Cc: Jennifer Culler; Alex Gunter; Steve Houck; Ronald Snyder; Douglas Staudt

Subject: RE: Political Paperwork Missing for Citizens For Rauner

Jean-

I want to get back to you with language on the public file and am happy to discuss on a call. First off, we had a meeting with Bobby Baker, who is the political point person at the FCC, in the beginning in 2012. We specifically asked about the NAB which is produced and distributed by the National Association of Broadcasters. He said it was fine to use the NAB but not a required piece of paperwork, it was created by the NAB to package all the information that needs to be contained in the public file.

I've attached a word document outlining the section from the FCC statue and rules for the appearances and adverting's.

Topline points:

A public file should be kept for: All legally qualified candidates for public office, Federal Elections, issues of national importance

What to put in the file: All the elements of the order: A-Did they except the race, B-What rate was charged, C-What dates did the tine run D-What class of time did they run E-Name and office of the issue or candidate F-Authorized agent requesting with all the contact information for candidate and

npaign.

A copy of the order and the ROR will capture all this information -As Bobby explain purpose of the file is for the general public to access the information so they can contact the campaign or agent of the campaign to make a formal complaint.

I hope this helps and I'm happy to get on the phone with you to discuss.

Tim

Tim Kay Director, Political Strategy p. 301-941-1643

From: <u>national@onmediaadsales.com</u>

Sent: Tuesday, February 04, 2014 3:40 PM

To: Michael Manross

Cc: Jennifer Culler; Alex Gunter; Steve Houck; rosnyder@onmediaadsales.com; dstaudt@onmediaadsales.com; <a href="mailto:dstau

Tim Kay

Subject: RE: Political Paperwork Missing for Citizens For Rauner

Michael-

Thank you for clarifying. It is my understanding that the NAB (or Agreement) form is a document required for the political file for all candidates.

However, your response seems to imply that the information contained on the NAB form is required to be placed in the file although the form itself is not. I'm not quite certain how the data will be placed in the file without the form. The NAB form and the ROR form do ask for different pieces of information.

I will ask Tim Kay to take a look at this issue upon his return.

While we are waiting for Tim's direction, would you please work on uploading the missing checks to the affiliate site or forwarding those to me?

Thanks for your help.

Thank You! Jean McClure

OnMedia National Ad Sales

Email: national@onmediaadsales.com

Illinois/lowa/Wisconsin - Jean McClure (309) 797-2907 x3108 Alabama/Florida/Georgia/Mississippi - Kortney Reed (770) 434-7071 Missouri - Katie Kearson (770) 431-5124 Technical - Rose Schneider (309) 797-2907 x3124 Fax: (309) 797-6752

From: Michael Manross < Michael.Manross@nccmedia.com >

Recieved: Tuesday, February 4, 2014 1:54 PM

To: "national@onmediaadsales.com" < national@onmediaadsales.com > **Subject:** RE: Political Paperwork Missing for Citizens For Rauner

Hi Jean,

This is a Candidate buy. On the subject of the NAB, below is what was sent to me and confirmed by our DC office. Also, the ROR should cover the bulk if not all of this.

The NAB is not a mandated paper work because it was created by the National Association of Broadcasters just to make it easier for stations.

But the information on the NAB is mandatory for the public file and should go in even if you are not in a window.

Below is what is required for a federal Candidate.

- (e) POLITICAL RECORD. -
- (1) IN GENERAL. A licensee shall maintain, and make available for public inspection, a complete record
- of a request to purchase broadcast time that -
- (A) is made by or on behalf of a legally qualified candidate for public office; or
- (B) communicates a message relating to any political matter of national importance, including -
- (i) a legally qualified candidate;
- (ii) any election to Federal office; or
- (iii) a national legislative issue of public importance.
- (2) CONTENTS OF RECORD. A record maintained under paragraph (1) shall contain information

regarding -

(A) whether the request to purchase broadcast time is accepted or rejected by the licensee;

(B) the rate charged for the broadcast time;

(C) the date and time on which the communication is aired;

(D) the class of time that is purchased;

(E) the name of the candidate to which the communication refers and the office to which the

candidate is seeking election, the election to which the communication refers, or the issue to

which the communication refers (as applicable);

(F) in the case of a request made by, or on behalf of, a candidate, the name of the candidate, the

authorized committee of the candidate, and the treasurer of such committee; and

(G) in the case of any other request, the name of the person purchasing the time, the name, address,

and phone number of a contact person for such person, and a list of the chief executive officers

or members of the executive committee or of the board of directors of such person.

(3) TIME TO MAINTAIN FILE. - The information required under this subsection shall be placed in a

political file as soon as possible and shall be retained by the licensee for a period of not less than 2 years.

Michael Manross Sales Manager p. 310-254-2230

From: national@onmediaadsales.com [mailto:national@onmediaadsales.com]

Sent: Tuesday, February 04, 2014 11:40 AM

To: Michael Manross

Cc: Jennifer Culler; Alex Gunter; Steve Houck; rosnyder@onmediaadsales.com; dstaudt@onmediaadsales.com; dstaudt@onmediaadsales.com;

Subject: RE: Political Paperwork Missing for Citizens For Rauner

Hi Michael!

Perhaps there was a miscommunication. We have this client coded as a candidate in our system. So just to be clear ... are you saying this is PAC money (NOT candidate money)?

Candidates are required to complete the NAB form. That is the form we are requesting.

I re-checked the affiliate site immediately before sending out the emails today for both the NAB form and the list of checks/proof of payments we are missing. Neither has been posted to the affiliate site.

Thank You!

Jean McClure

OnMedia National Ad Sales

Email: national@onmediaadsales.com

Illinois/Iowa/Wisconsin - Jean McClure (309) 797-2907 x3108 Alabama/Florida/Georgia/Mississippi - Kortney Reed (770) 434-7071

Missouri - Katie Kearson (770) 431-5124

Technical - Rose Schneider (309) 797-2907 x3124

Fax: (309) 797-6752

From: Michael Manross < Michael.Manross@nccmedia.com >

Recieved: Tuesday, February 4, 2014 12:57 PM

To: "national@onmediaadsales.com" < national@onmediaadsales.com > Subject: RE: Political Paperwork Missing for Citizens For Rauner

Hi Jean – Access Media/Target Media does not sign any ppwk as they are not required by State or Federal law. They submit only what is stated as required by the FEC, which is the standard information on the ROR and Payment info. Both of those are posted on spotcable. If you can't find them there, let me know and I'll make sure they're posted correctly.

Thanks,

Mike

Michael Manross Sales Manager p. 310-254-2230

From: national@onmediaadsales.com [mailto:national@onmediaadsales.com]

Sent: Tuesday, February 04, 2014 10:53 AM To: Michael Manross; Ryan Bartholomew

Cc: Jennifer Culler; Alex Gunter; Steve Houck; RoSnyder@OnMediaAdSales.com

Subject: Political Paperwork Missing for Citizens For Rauner

Dear Michael Manross,

Political paperwork is missing for the following orders for Citizens For Rauner:

61963331-7908 Citizens For Rauner 11/11/13 - 12/01/13 \$742 Done Add Done Done No Info Email Note X

61963352-7589 Citizens For Rauner 11/11/13 - 11/24/13 \$1,316 Done Add Done Done No Info Email Note X 61963627-7589 Citizens For Rauner 11/18/13 - 12/01/13 \$1,090 Done Add Done Done No Info Email Note X

61963631-7908 Citizens For Rauner 11/18/13 - 12/01/13 \$1,053 Done Add Done Done No Info Email Note X

61967476-7908 Citizens For Rauner 12/02/13 - 12/29/13 \$2,241 Done Add Done Done No Info Email Note X

61975256-7908 Citizens For 61975284-7589 Citizens For 61977332-7589 Citizens For 61977423-7908 Citizens For 61979071-7589 Citizens For 61979088-7908 Citizens For 61981180-7589 Citizens For 61981213-7908 Citizens For 61982878-7589 Citizens For 61982880-7908 Citizens For 61984910-7908 Citizens For 61984912-7589 Citizens For 61977332-7589 Citizens For 61977423-7908 Citizens For 61979071-7589 Citizens For 61979088-7908 Citizens For 61979088-7908 Citizens For 61982878-7589 Citizens For 61982878-7589 Citizens For 61982880-7908 Citizens For 61982880-7908 Citizens For 61984910-7908 Citizens For 61984910-7908 Citizens For 61984912-7589 Citizen	Rauner 12/30/13 - 01/12 Rauner 12/30/13 - 01/12 Rauner 01/06/14 - 01/13 Rauner 01/06/14 - 01/13 Rauner 01/13/14 - 01/26 Rauner 01/13/14 - 02/09 Rauner 01/20/14 - 02/09 Rauner 01/20/14 - 03/23 Rauner 02/03/14 - 03/23 Rauner 02/03/14 - 03/23 Rauner 02/03/14 - 03/23 es of the attached form(s ayment or submit it on th Rauner 01/06/14 - 01/19/ Rauner 01/06/14 - 01/19/ Rauner 01/13/14 - 01/26/ Rauner 01/13/14 - 03/23/ Rauner 02/03/14 - 03/23/	9/13 \$3,744 Done Add Done Done No Info Email No 2/14 \$754 Done Add Done Done No Info Email No 2/14 \$754 Done Add Done Done No Info Email No 2/14 \$1,256 Done Add Done Done No Info Email No 2/14 \$1,248 Done Add Done Add No Info Email No 2/14 \$1,248 Done Add Done Add No Info Email No 2/14 \$1,248 Done Add Done Add No Info Email No 2/14 \$1,248 Done Add Done Add No Info Email No 2/14 \$2,535 Done Add Done Done No Info Email No 2/14 \$2,535 Done Add Done Done No Info Email No 2/14 \$1,552 Done Add Done Add No Info Email No 2/14 \$1,552 Done Add Done Add No Info Email No 2/14 \$3,510 Done Add Done Add No Info Email No 2/14 \$3,510 Done Add Done Add No Info Email No 2/14 \$1,248 Done Add Done Add No Info Email No 2/14 \$7,248 Done Add Done Add No Info Email No 2/14 \$1,248 Done Add Done Add No Info Email No 2/14 \$7,428 Done Add Done Add No Info Email No 2/14 \$1,248 Done Add Done Add No Info Email No 2/14 \$7,428 Done Add Done Add No Info Email No 2/14 \$3,510 Done Add Do	ote X ote X Note X ote X
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Task Attachments			
Task Notes			
User:	Date: 02/06/2014 14:01	Mark for Fwd/Reply:	
Task Downloaded.			
User: Jean McClure	Date: 02/06/2014 15:36	Mark for Fwd/Reply:	
Deeneneihle Deede			

Admin Contact: Rosemarie Schneider, Senior Analyst, rschneider@onmediaadsales.com

Responsible Person changed to jmcclure.